

REDACTED

-FILED-

FEB 26 2020

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION

At <sup>M</sup>  
ROBERT N. TRGOVICH, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA )  
 )  
 v. ) Cause No. 1:20-CR-12  
 ) Violations:  
 ADAM BOCK ) 18 U.S.C. §§ 2314, 2  
 ) 18 U.S.C. §§ 511(a)(1), 2

**THE GRAND JURY CHARGES:**

COUNTS 1-16

From on or about November 13, 2017, to on or about April 25, 2018, in  
the Northern District of Indiana and elsewhere,

ADAM BOCK,

defendant herein, and others known and unknown to the Grand Jury, aiding  
and abetting each other, did unlawfully transport and cause to be transported  
in interstate commerce stolen goods and merchandise, namely travel trailers,  
having a value of more than \$5,000, knowing the same to be stolen, to wit:

Count 1: On or about November 12, 2017, a Forest River Patriot, rebranded  
Stone River, VIN ending in JA468001.

Count 2: On or about November 30, 2017, a Forest River Hemisphere, rebranded  
Stone River, VIN ending in JA468004.

Count 3: On or about January 25, 2018, a Coachman Freedom Maple,  
rebranded Stone River, VIN ending JA468009.

Count 4: On or about January 26, 2018, a Coachman Clipper, rebranded Stone River, VIN ending in JA468011.

Count 5: On or about January 29, 2018, a Coachman Clipper, rebranded Stone River, VIN ending in JA468010.

Count 6: On or about January 29, 2018, a Coachman Freedom Express Blast, rebranded Stone River, VIN ending in JA468007.

Count 7: On or about January 29, 2018, a Winnebago Minnie Plus, rebranded Stone River, VIN ending in JA468008.

Count 8: On or about January 30, 2018, a Forest River Grey Wolf, rebranded Stone River, VIN ending in JA468006.

Count 9: On or about April 6, 2018, a Forest River Salem Hemisphere, rebranded Stone River, VIN ending in KA468007.

Count 10: On or about April 6, 2018, a Forest River Wildwood Heritage Glen, rebranded Stone River, VIN ending in KA468006.

Count 11: On or about April 8, 2018, a Forest River Sandpiper, rebranded Stone River, VIN ending in KA468009.

Count 12: On or about April 8, 2018, a Forest River Salem Villa Estate, rebranded Stone River, VIN ending in KA468010.

Count 13: On or about April 10, 2018, a Catalina, rebranded Stone River, VIN ending in KA468016.

Count 14: On or about April 12, 2018, a Forest River Salem Hemisphere, rebranded Stone River, VIN ending in KA468018.

Count 15: On or about April 17, 2018, a Cedar Creek, rebranded Stone River, VIN ending in KA468019.

Count 16: On or about April 25, 2018, a Puma, rebranded Stone River, VIN ending in KA468011;

All in violation of 18 U.S.C. §§ 2314 and 2.

**THE GRAND JURY FUTHER CHARGES:**

COUNT 17

From on or about April 1, 2018, to on or about April 25, 2018, in the Northern District of Indiana and elsewhere,

ADAM BOCK,

defendant herein, and others known and unknown to the Grand Jury, aiding and abetting each other, did unlawfully transport and cause to be transported in interstate commerce stolen goods and merchandise, namely a Forest River, Rockwood travel trailer with VIN ending in KZ157296, having a value of more than \$5,000, knowing the same to be stolen;

All in violation of 18 U.S.C. §§ 2314 and 2.

**THE GRAND JURY FUTHER CHARGES:**

COUNT 18

Between from on or about January 19, 2018, and May 23, 2018, in the Northern District of Indiana and elsewhere,

ADAM BOCK,

defendant herein, and others known and unknown to the Grand jury aiding and abetting each other, did knowingly and unlawfully tamper with and alter, and remove and obliterate the vehicle identification number 4X4TPAH22JN050028 for a motor vehicle, to wit: a Palomino Solaire trailer and replacing it with a vehicle identification number 4S91C3623JA468005;

All in violation of 18 U.S.C. §§ 511(a)(1) and 2.

**THE GRAND JURY FUTHER CHARGES:**

COUNT 19

Between on or about April 6, 2018, until on or about April 26, 2018, in the Northern District of Indiana and elsewhere,

ADAM BOCK,

defendant herein, and others known and unknown to the Grand jury aiding and abetting each other, did knowingly and unlawfully remove, obliterate, tamper with, and alter the vehicle identification number 1M9L33829J1031607 for a motor vehicle, to wit: a Merhow horse trailer and replacing it with a vehicle identification number 4S94E3823KA468012;

All in violation of 18 U.S.C. §§ 511(a)(1) and 2.



**THE GRAND JURY FUTHER CHARGES:**

COUNT 20

Between on or about May 24, 2017, until on or about October 21, 2017,  
in the Northern District of Indiana and elsewhere,

ADAM BOCK,

defendant herein, and others known and unknown to the Grand jury aiding  
and abetting each other, did knowingly and unlawfully remove, obliterate,  
tamper with, and alter the vehicle identification number  
4X4TCKC26JX130333 for a motor vehicle, to wit: a Grey Wolf trailer and  
replacing it with a vehicle identification number 4S91C2727JA468002;

All in violation of 18 U.S.C. §§ 511(a)(1) and 2.

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 20 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of any of the offenses charged in Counts 1 through 20 of this Indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation(s).

A money judgement representing the amount of proceeds obtained as a result of the offenses, for which the defendant is jointly and severally liable.

If any property described above, as a result of any act or omission of the defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without

difficulty; the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b).

A TRUE BILL

/s/ Foreperson  
Foreperson

THOMAS L. KIRSCH, II  
UNITED STATES ATTORNEY

/s/ Stacey R. Speith  
By: Stacey R. Speith  
Assistant United States Attorney